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May 19, 2008

Jackalyne Pfannenstiel, Chair
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Subject: Comments on the Land Use Subgroup of the Climate Action Team submission to the California Air Resources Board Scoping Plan on Local Government, Land Use and Transportation

Dear Chair Pfannenstiel,

The Southern California Association of Governments (SCAG) appreciates the opportunity to comment on the Land Use Subgroup of the Climate Action Team (LUSCAT) submission to the California Air Resources Board (CARB) Scoping Plan on Local Government, Land Use and Transportation.

In general, the strategies developed by LUSCAT recognize that Metropolitan Planning Organizations (MPOs) are well-positioned to play a role in AB 32 implementation due to our regional structure, our experience with Blueprint programs and our analytical tools. However, SCAG recommends that regional differences should be considered when developing statewide programs such as funding sources, size and implementation authority. For example, our current federal funding restricts allowable work to transportation planning. This constrains our ability to pursue the regional role envisioned in the LUSCAT report. Therefore, SCAG agrees with the report's assertion that "the state should work with regional and local government to develop consistent funding mechanisms to support planning activities and plan implementation that are not solely dependent on sales tax revenues, new development, or transportation funds." We also recommend that any new regional role contemplated under AB 32 is made distinct from our responsibilities and authorities under federal transportation law.

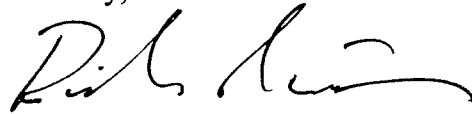
SCAG would like to express support for an expansion of the role of Regional Blueprint Planning recommended in the LUSCAT report. SCAG plans to address greenhouse gas (GHG) emissions with funds from the latest round of Blueprint grants. SCAG agrees that efforts such as the Regional Blueprint Planning process could be further strengthened to develop GHG emissions reduction targets with extensive participation from municipalities and stakeholders. As the report notes, this will require that additional funding be secured for outreach and technical work. Further, SCAG agrees that guidance

and training such as guidelines and modeling tools will be necessary to support this collaborative effort and to consistently track progress.

SCAG welcomes more interaction with our Regional Council members and would recommend holding multiple workshops throughout southern California once the draft Scoping Plan is released. Our members are extremely interested in how AB 32 will affect local governments and what future activities will be required.

In conclusion, SCAG looks forward to working with ARB and other stakeholders on AB 32 implementation. As an MPO, we have a unique opportunity to address climate change in an integrated way that protects local control while encouraging regional cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Rich Macias", with a stylized, flowing script.

Rich Macias,
Interim Director of Planning and Policy
Southern California Association of Governments